STATEMENT OF BASIS

Alabama Power Company
Washington County Cogeneration Plant
McIntosh, Alabama
Washington County
108-0018

This proposed renewal to the Title V Major Source Operating Permit is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above-referenced applicant has applied to renew the existing Title V Permit, which was originally issued on August 13, 2003. The applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents, which were submitted on February 11, 2008, and are attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

The Washington County Cogeneration Plant is owned and operated by Alabama Power Company and is located in McIntosh, Alabama. The Washington County Cogeneration Plant provides steam to the adjacent Olin Chemical Plant (Olin) and generates nominally 102 MW (137 MW peak) of electric power for distribution to Alabama Power customers. Although this plant is adjacent to Olin, the Washington County Cogeneration Plant is a separate source that is not under common control or ownership.

The Washington County Cogeneration Plant was issued its existing Major Source Operating Permit (MSOP) on August 13, 2003 with an expiration date of August 12, 2008. Per ADEM Rule 335-3-16-.12(2), an application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of the permit. Based on this rule, the application for renewal was due to the Department no later than February 13, 2008, but no earlier than February 13, 2007. An application for permit renewal was received by the Department on February 11, 2008. No additional information was deemed necessary for processing of this MSOP.

Subsequent to the submittal of the Title V Major Source Operating Permit renewal application for the above-referenced applicant, changes were made at the facility. Alabama Power Company's Washington County Cogeneration Plant has since removed the 20,000 gallon diesel fuel storage tank previously utilized with Package Boiler PB401 and, therefore, diesel fuel is no longer available. The Combined Cycle Unit and PB401 were previously permitted to combust/evaporate non-hazardous wastewater containing hydrazine. The wastewater containing hydrazine was produced by a unit at Olin and this unit has been removed from the chemical plant and therefore, no wastewater containing hydrazine is available. With the changes made to the Washington County Plant as stated above, the following are the significant sources of air pollutants at the facility:

- 100 MW Combined Cycle Unit (Combustion Turbine with Duct Burner and Heat Recovery Steam Generator)

- 184 MMBtu/hr Package Boiler (PB 201R)
- 184 MMBtu/hr Package Boiler (PB 301R)
- 190 MMBtu/hr Package Boiler (PB 401)

100 MW Combined Cycle Unit

The combined cycle unit (combustion turbine with duct burner and heat recovery steam generator) generates nominally 102 megawatts (137 MW peak) of electric power for distribution. The combustion turbine generates approximately 80 megawatts (100 MW peak) of electric power and fires only pipeline quality natural gas. The duct burner has a heat input rating of 260 MMBtu/hr and provides the capability to produce additional steam for the heat recovery steam generator (HRSG). The duct burner fires natural gas and/or hydrogen. Steam produced by the HRSG is sent to the adjacent Olin Chemical plant and the remainder is used to run a steam turbine with a capacity of 22 MW (37 MW peak).

The combined cycle unit was subject to a Prevention of Significant Deterioration (PSD) Review in which BACT was established for NO_x, CO, VOC, and PM. The combustion turbine is subject to the Federal New Source Performance Standards (NSPS) contained in 40 CFR Part 60, Subpart GG, and the duct burners are subject to NSPS Subpart Db. The combined cycle unit is also subject to the Acid Rain Program and the Clean Air Interstate Rule (CAIR) Program. The combined cycle unit's expected emissions and the associated standards are listed below.

Emission Standards

Opacity:

- Visible Emissions from the combined cycle/duct burner stack shall not exceed 10%. (ADEM Admin. Code r. 335-3-14-.04(9)(b))

Particulate Matter (PM):

- Particulate emissions from the combustion turbine shall not exceed 0.01 lb/MMBtu and 5.0 lbs/hr. (ADEM Admin. Code r. 335-3-14-.04(9)(b)) BACT.
- The Particulate emissions from the duct burner shall not exceed 0.02 lb/MMBtu and 2.9 lbs/hr. (ADEM Admin. Code r. 335-3-14-.04(9)(b)) BACT.
- Particulate emissions from the combined turbine/duct burner stack shall not exceed 0.01 lb/MMBtu and 7.9 lb/hr. (ADEM Admin. Code r. 335-3-14-.04(9)(b)) BACT.
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04)

Sulfur Dioxide (SO_2):

- The combined cycle unit is subject to the Acid Rain Regulations. This unit is not allocated SO_2 allowances under Phase II of the Acid Rain Program (ADEM Admin. Code r. 335-3-18-.01 and 40 CFR Part 73).

The unit shall hold sufficient allowances in the unit account to cover annual SO_2 emissions.

Nitrogen Oxides (NO_x):

- Nitrogen Oxides emissions from the combustion turbine shall not exceed 15 ppmvd @ 15% O_2 and 62.5 lbs/hr. (ADEM Admin Code r. 335-3-14-.04(9)(b)) BACT
- Nitrogen Oxides emissions from the duct burner shall not exceed 0.20 lb/MMBtu and 34.0 lbs/hr. (ADEM Admin Code r. 335-3-14-.04(9)(b)) BACT
- Nitrogen Oxides emissions from the combined combustion turbine/duct burner stack shall not exceed 0.09 lb/MMBtu and 96.5 lbs/hr. (ADEM Admin Code r. 335-3-14-.04(9)(b)) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin Code r. 335-3-14-.04) These emission limits are more stringent than those listed in 40 CFR 60, Subpart GG. The emission limit under 40 CFR 60, Subpart Db for the duct burner is 0.20 lb/MMBtu.

Carbon Monoxide (CO):

- Carbon Monoxide emissions from the combustion turbine shall not exceed 0.07 lb/MMBtu and 61.5 lbs/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- Carbon Monoxide emissions from the duct burner shall not exceed 0.07 lb/MMBtu and 18.2 lbs/hr when operating above a heat input of 130 MMBtu/hr and 0.1 lb/MMBtu when operating at or below a heat input of 130 MMBtu/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- Carbon Monoxide emissions from the combined combustion turbine/duct burner stack shall not exceed 0.08 lb/MMBtu and 79.7 lbs/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04)

Volatile Organic Compounds (VOC):

- Volatile Organic Compound emissions from the combustion turbine shall not exceed 3.7 lbs/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- Volatile Organic Compound emissions from the duct burner shall not exceed 3.4 lbs/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- Volatile Organic Compound emissions from the combined combustion turbine/duct burner stack shall not exceed 7.1 lbs/hr. (ADEM Admin. Code r. 335-3-14-04) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04)

Expected Emissions

Particulate Matter (PM) and Opacity:

- During initial performance testing, the PM emission rate was approximately 0.0033 lb/MMBtu while firing the duct burner, which should represent the worst case emission rate. No visible emissions are expected from the unit while firing natural gas.

Sulfur Dioxide (SO_2):

- Natural gas is the primary fuel for this unit, resulting in an emission rate of approximately 0.0006 lb/MMBtu.

Nitrogen Oxides (NO_x):

- The unit is required to monitor NO_x with a Continuous Emissions Monitoring System (CEMS). CEMS data indicates that NO_x emissions from the Combined CT and Duct Burner are below the permitted emission limits. During the 2003 compliance stack test for the unit, the NO_x emissions were 0.06 lb/MMBtu and 66.7 lb/hr. for the combined unit, which is below the permit limits.

Carbon Monoxide (CO):

- During the 2003 compliance testing, the CO emission rates from the unit were below the permitted allowable emissions limits. The CO emission rates for the combined unit were 0.0004 lb/MMBtu, and 0.4167 lb/hr.

Volatile Organic Compounds (VOC):

- During initial compliance testing, the VOC emission rates from the unit were below the permitted allowable emissions limits. The VOC emission rates for the combined unit were approximately 0.0067 lb/MMBtu, and 0.7 lb/hr.

Periodic Monitoring

Particulate Matter (PM) and Opacity:

- Based on the low expected levels of emissions as compared to the regulatory allowable emission limits, periodic monitoring of opacity and particulate matter emissions is not considered necessary.

Sulfur Dioxide (SO_2):

- There are no emissions limits for SO_2 for this unit. This unit is not allocated annual SO_2 allowances through the Acid Rain Program. However, they must hold enough allowances to cover their annual SO_2 emissions. The provisions in 40 CFR 75 are utilized to track annual SO_2 emissions.

Nitrogen Oxides (NO_x):

- This unit is required by 40 CFR Part 75 to maintain and operate a NO_x Continuous Emissions Monitoring System (CEMS). The NOx CEMS will be utilized for periodic monitoring of NO_x emissions.

Carbon Monoxide (CO) and Volatile Organic Compounds (VOC):

- Based on the low expected levels of emissions as compared to the regulatory allowable emission limits, only minimal periodic monitoring of CO and VOC emissions is considered necessary.

Compliance Assurance Monitoring (CAM)

Since no control equipment is utilized to meet any applicable emissions limitations, CAM does not apply to any pollutant emitted by this unit.

190 MMBtu/hr Package Boiler (PB 401)

The 190 MMBtu/hr Package Boiler can be fired by natural gas, or hydrogen. This boiler is normally used for backup purposes to ensure adequate steam supply to the Olin plant. Although allowed to operate full time, the unit's normal capacity factor is less than 10% with the majority of that operating time firing natural gas.

The unit was subject to a Prevention of Significant Deterioration (PSD) Review in which BACT was established for NO_x, CO, VOC, SO_2 and PM. The boiler is subject to the Federal New Source Performance Standards (NSPS) contained in 40 CFR Part 60, Subpart Db.

During initial performance testing, the boiler could not meet the allowable NO_x BACT limit at an operating load of less than 61.24 MMBtu/hr while firing natural gas. Therefore, when the boiler fired natural gas, it was initially restricted from operating at loads less than that to ensure compliance with the NO_x limit. Following issuance of the initial Title V permit, the boiler underwent additional performance testing and met the applicable NOx limits at low and high loads. Subsequently, NOx CEMS were installed on this boiler to provide an indication of NOx emissions.

The expected emissions and the associated standards for the 190 MMBtu/hr Package Boiler (PB 401) are listed below.

Emission Standards

Opacity:

- Visible Emissions shall not exceed 10%. (ADEM Admin. Code r. 335-3-14-.04(9)(b))

Particulate Matter (PM):

- Particulate matter emissions shall not exceed 0.01 lb/MMBtu and 1.9 lb/hr when burning natural gas or hydrogen or combinations thereof. (ADEM Admin. Code r. 335-3-14-.04(9)(b)) BACT.

- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04)

Nitrogen Oxides (NO_x):

- Nitrogen Oxide emissions shall not exceed 0.05 lb/MMBtu and 9.5 lb/hr when burning natural gas, 0.07 lb/MMBtu and 13.3 lb/hr when burning hydrogen or combinations thereof of natural gas and hydrogen. (ADEM Admin Code r. 335-3-14-.04(9)(b)) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04) These emission limits are more stringent than those listed in 40 CFR 60, Subpart Db. For this unit, the Subpart DB limit is 0.20 lb/MMBtu while burning natural gas.

Carbon Monoxide (CO):

- Carbon Monoxide emissions shall not exceed 0.17 lb/MMBtu & 32.3 lb/hr when burning natural gas, hydrogen, or combinations thereof. (ADEM Admin. Code r. 335-3-14-04) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r 335-3-14-04)

Volatile Organic Compounds (VOC):

- Volatile Organic Compound emissions shall not exceed 1.0 lb/hr when burning natural gas, 1.7 lb/hr when burning hydrogen or a combination of natural gas and hydrogen. (ADEM Admin. Code r. 335-3-14-04) BACT
- The above emissions limits are BACT limits resulting from a PSD review. (ADEM Admin. Code r. 335-3-14-04)

Expected Emissions

Particulate Matter (PM) and Opacity:

- During 2005 performance testing, the PM emission rate was approximately 0.0006 lb/MMBtu while firing natural gas and 0.007 lb/MMBtu while firing natural gas and hydrogen. . No visible emissions are expected from the unit while firing natural gas.

Sulfur Dioxide (SO_2):

- Natural gas is the primary fuel for this unit, resulting in an emission rate of approximately 0.0006 lb/MMBtu.

Nitrogen Oxides (NO_x):

- During initial compliance testing, the NO_x emission rates from the unit were below the permitted allowable emissions limits. The emission rates while burning natural gas were 0.04 lb/MMBtu and 6.02 lb/hr.

Carbon Monoxide (CO):

- During 2005 compliance testing, the CO emission rates were 0.23 lb/hr and 0.0025 lb/MMBtu while burning natural gas and hydrogen, which are below the permitted limits. During initial compliance testing, the CO emission rates from the unit were 0.012 lb/MMBtu and 2.35 lb/hr while burning natural gas. . All of the emissions during testing were below the permitted allowable limits.

Volatile Organic Compounds (VOC):

- The low CO concentrations observed during the initial compliance testing are a very good indication of near complete combustion. Therefore, the emissions of VOC should be negligible.

Periodic Monitoring

Particulate Matter (PM) and Opacity:

- Based on the low expected levels of emissions as compared to the regulatory allowable emission limits, periodic monitoring of opacity and particulate matter emissions is not considered necessary while firing natural gas.

Nitrogen Oxides (NO_x):

- The NO_x emission rate from this unit shall be monitored by a NO_x Continuous Emissions Monitoring System (CEMS). The NO_x emission rate shall be monitored on a 30-day rolling average. The NO_x CEMS shall be maintained and certified using the procedures of 40 CFR 60.

Carbon Monoxide (CO) and Volatile Organic Compounds (VOC):

- Based on the fact that this unit is operated very infrequently and based on the low expected levels of emissions as compared to the regulatory allowable emission limits, no periodic monitoring is deemed necessary.

Compliance Assurance Monitoring (CAM)

The only pollutant subject to Compliance Assurance Monitoring (CAM) is NO_x since the unit is utilizing a control device, Flue Gas Recirculation (FGR), to meet an applicable limit, and the pre-controlled potential NO_x emissions from the unit are greater than 100 TPY. Even though other pollutants' potential emissions are greater than the respective major source threshold, no control devices are used to meet any applicable limitations; therefore, CAM does not apply to those pollutants.

This unit is required by 40 CFR Part 60 to maintain and operate a NO_x Continuous Emissions Monitoring System (CEMS). The CEMS will also serve as the compliance assurance monitoring for NO_x. Details of the CAM Plan are attached to this document.

Two (2) 184 MMBtu/hr Package Boilers (PB 201R & PB 301R)

These boilers can be fired by natural gas or hydrogen. In order to avoid a PSD review for PB201R and PB301R, Alabama Power accepted emission limits to remain below the significant thresholds. The units are subject to the Federal New Source Performance Standards (NSPS) contained in 40 CFR Part 60, Subpart Db. FGR is utilized by each of the units to reduce NO_x emissions.

The expected emissions and the associated standards for the two (2) 184 MMBtu/hr Package Boilers (PB 201R & PB 301R) are listed below.

Emission Standards

Opacity:

- These units shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall these units discharge a 6-minute average opacity of particulate emissions greater than 40%. (ADEM Admin. Code r. 335-3-4-.01)

Particulate Matter (PM):

- The particulate matter emission rate from each of these units shall not exceed 3.0 lb/hr as determined by the "Process Weight Equation", except during periods of startup, shutdown, or load change. (ADEM Admin. Code r. 335-3-14-.04) Anti-PSD.

Sulfur Dioxide (SO_2):

- These boilers shall fire only natural gas and/or hydrogen. (ADEM Admin. Code r. 335-3-14-.04) Anti-PSD.

Nitrogen Oxides (NO_x):

- The Nitrogen Oxides emission rate from each of these units shall not exceed 0.20 lb/MMBtu based on a 30-day rolling average. (ADEM Admin Code r. 335-3-10-.02(2)(b), 40 CFR 60.44Da
- The Nitrogen Oxides emission rate from each of these units shall not exceed 9.0 lb/hr, except during startup, shutdown, or load change, based on a 3-hour rolling average. (ADEM Admin. Code r. 335-3-14-.04) Anti-PSD.

Expected Emissions

Particulate Matter (PM) and Opacity:

- During initial performance testing for PB301R, the PM emission rate was measured at multiple loads while firing natural gas and a combination of natural gas and hydrogen. The maximum emission rate was 0.2455 lb/hr, which was well below the permitted allowable emissions limit of 3.0 lb/hr. PB201R has a vendor guarantee for particulate emissions of 2.21 lb/hr. No visible emissions are expected from the units while firing natural gas or hydrogen.

Sulfur Dioxide (SO_2):

- Insignificant emissions of SO_2 would be expected based upon the firing of natural gas and hydrogen. In order to avoid a PSD review for SO_2, the facility agreed to only fire natural gas and hydrogen.

Nitrogen Oxides (NO_x):

- During initial compliance testing, the NO_x emission rates were measured at multiple loads while firing natural gas and a combination of natural gas and hydrogen. The maximum emission rates from PB301R were 0.0321 lb/MMBtu and 5.1841 lb/hr, below the permitted allowable emission limits of 0.2 lb/MMBtu and 9.0 lb/hr. The maximum emission rates from PB201R were determined by the Department to be 7.41 lb/hr, below the 9.0 lb/hr limit. .

Periodic Monitoring

Particulate Matter (PM) and Opacity:

- Based on the low expected levels of emissions as compared to the regulatory allowable emission limits, periodic monitoring of opacity and particulate matter emissions is not considered necessary while firing natural gas.

Nitrogen Oxides (NO_x):

- The NO_x emission rate from this unit shall be monitored by a NO_x Continuous Emissions Monitoring System (CEMS). The NO_x emission rate shall be monitored on a 30-day rolling average. The NO_x CEMS shall be maintained and certified using the procedures of 40 CFR 60.

Compliance Assurance Monitoring (CAM)

The only pollutant subject to Compliance Assurance Monitoring (CAM) is NO_x since the unit is utilizing a control device, Flue Gas Recirculation (FGR), to meet an applicable limit, and the pre-controlled potential NO_x emissions from the unit are greater than 100 TPY. Even though other pollutants' potential emissions are greater than the respective major source threshold, no control devices are used to meet any applicable limitations; therefore, CAM does not apply to those pollutants.

This unit is required by 40 CFR Part 60 to maintain and operate a NO_x Continuous Emissions Monitoring System (CEMS). The CEMS will also serve as the compliance assurance monitoring for NOx. Details of the CAM Plan are attached to this document.

Adam G. Crocker
Energy Branch
Air Division

January 26, 2011
Date

ADEM
Alabama Department of Environmental Management

MAJOR SOURCE OPERATING PERMIT

Permitee: **Alabama Power Company**

Facility Name: **Washington County Cogeneration Plant**

Facility No.: 108-0018

Location: McIntosh, Washington County, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code 1975, §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code 1975, §§22-22A-1 to 22-22A-15, (2006 Rplc. Vol. and 2007 Cum. Supp.) and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: *DRAFT*

Expiration Date:

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General Permit Provisos

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1. Transfer	
This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.	Rule 335-3-16-.02(6)
2. Renewals	
An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	Rule 335-3-16-.12(2)
The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. Severability Clause	
The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-16-.05(e)
4. Compliance	
(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-16-.05(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting	Rule 335-3-16-.05(g)

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or reducing the permitted activity.	
5. Termination for Cause	
This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	Rule 335-3-16-.05(h)
6. Property Rights	
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-16-.05(i)
7. Submission of Information	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-16-.05(j)
8. Economic Incentives, Marketable Permits, and Emissions Trading	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-16-.05(k)
9. Certification of Truth, Accuracy, and Completeness:	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	Rule 335-3-16-.07(a)

General Permit Provisos

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10. Inspection and Entry	
Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	Rule 335-3-16-.07(b)
(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. Compliance Provisions	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-16-.07(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. Compliance Certification	
A compliance certification shall be submitted yearly by August 31 covering the period from July 1 through June 30 unless more frequent periods are specified according to the specific rule governing the source or required by the Department.	Rule 335-3-16-.07(e)
(a) The compliance certification shall include the following:	

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(1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); (4) Whether the method(s) or other means used to assure compliance provided continuous or intermittent data; (5) Such other facts as the Department may require to determine the compliance status of the source; (b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13. <u>Reopening for Cause</u> Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit: (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire.	Rule 335-3-16-.13(5)

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(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit.	
(c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	
(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	
14. Additional Rules and Regulations	
This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
15. Equipment Maintenance or Breakdown	
(a) Unless otherwise specified in the unit-specific provisos of this permit, in the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	Rule 335-3-1-.07(1),(2)
(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
(2) The expected length of time that the air pollution control equipment will be out of service;	
(3) The nature and quantity of emissions of air contaminants likely to occur during the	

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shutdown period; (4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period; (5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period. (b) Unless otherwise specified in the unit-specific provisos of this permit, in the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.	
16. Operation of Capture and Control Devices Unless otherwise specified in the unit-specific provisos of this permit, all air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.	§22-28-16(d), Code of Alabama 1975, as amended
17. Obnoxious Odors This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	Rule 335-3-1-.08
18. Fugitive Dust (a) Reasonable precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds,	Rule 335-3-4-.02

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stockpiles, screens, dryers, hoppers, ductwork, etc. (b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne: (1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; (2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; (3) By paving; (4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or (5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface. Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.	
19. Additions and Revisions Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.	Rule 335-3-16-.13 and .14
20. Recordkeeping Requirements (a) Records of required monitoring information of the source shall include the following:	Rule 335-3-16-.05(c)(2)

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(1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement. (b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21. Reporting Requirements (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	Rule 335-3-16-.05(c)3
22. Emission Testing Requirements (a) Each point of emission which requires testing will be	Rule 335-3-1-.05(3)

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	provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	and Rule 335-3-1-.04(1)
(b)	The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.	
(c)	To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	
	(1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	Rule 335-3-1-.04
	(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).	
	(3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
	(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
(d)	A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.	Rule 335-3-1-.04
(e)	All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by	

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the Air Division.	
23. Payment of Emission Fees	
Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.	Rule 335-1-7-.04
24. Other Reporting and Testing Requirements	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.	Rule 335-3-1-.04(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.	40 CFR Part 82
No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F.	
The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then:	40 CFR Part 68
(a) The owner or operator shall comply with the provisions in 40 CFR Part 68.	
(b) The owner or operator shall submit one of the following:	

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(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or,	
(2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27. Display of Permit	
This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.	Rule 335-3-14-.01(1)(d)
28. Circumvention	
No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.	Rule 335-3-1-.10
29. Visible Emissions	
Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	Rule 335-3-4-.01(1)
30. Fuel-Burning Equipment	
Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.	Rule 335-3-4-.03
Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.	Rule 335-3-5-.01
31. Process Industries – General	

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Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.	Rule 335-3-4-.04
32. Averaging Time for Emission Limits	
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	Rule 335-3-1-.05
33. Compliance Assurance Monitoring (CAM)	
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this	

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part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (4) Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and	

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maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	
(2) Elements of a QIP:	

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A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

B. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above).

(3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

A. Failed to address the cause of the control device performance problems; or

B. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control

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practices for minimizing emissions.	
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) Reporting and Recordkeeping Requirements	40 CFR 64.9
(1) General reporting requirements	
A. On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-16-.05(c)3.	
B. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)3. and the following information, as applicable:	
(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and	
(iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the	

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implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	
(2) General recordkeeping requirements.	
A. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).	
B. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Savings Provisions	40 CFR 64.10
(3) Nothing in this part shall:	
A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the	

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Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part. B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable. C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	
34. <u>Emissions Inventory Reporting Requirements</u> In order to meet the statewide emissions inventory reporting requirements under 40 CFR 51, Appendix A, the permittee shall comply with the reporting requirements under ADEM Admin. Code r. 335-3-1-.15.	Rule 335-3-1-.15
35. <u>Permit Shield</u> (a) A permit shield exists under this operating permit in accordance with ADEM Admin. Code 335-3-16-	Rule 335-3-16-.10

.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in this operating permit.

(b) Nothing in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;

(2) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act; or

(4) The ability of EPA to obtain information from a source pursuant to Section 114 of the Act.

Summary Page for 100 MW Natural Gas Fired Combustion Turbine w/ Natural Gas/Hydrogen Fired 260 MMBtu/hr Duct Burner and Heat Recovery Steam Generator

Permitted Operating Schedule: 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
001	Combined CT/Duct Burner Exhaust	PM	CT – 0.01 lb/MMBtu & 5.0 lb/hr DB – 0.02 lb/MMBtu & 2.9 lb/hr Combined – 0.01 lb/MMBtu & 7.9 lb/hr	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
001	Combined CT/Duct Burner Exhaust	NOx	CT – 15 ppmvd @15% O_2 & 62.5 lb/hr DB – 0.20 lb/MMBtu & 34 lb/hr Combined – 0.09 lb/MMBtu & 96.5 lb/hr	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
001	Combined CT/Duct Burner Exhaust	SO_2	N/A	N/A
001	Combined CT/Duct Burner Exhaust	CO	CT – 0.07 lb/MMBtu & 61.5 lb/hr DB (> 130 MMBtu/hr) 0.07 lb/MMBtu & 18.2 lb/hr DB (</= 130 MMBtu/hr) 0.1 lb/MMBtu Combined – 0.08 lb/MMBtu & 79.7 lb/hr	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
001	Combined CT/Duct Burner Exhaust	VOC	CT – 3.7 lb/hr DB – 3.4 lb/hr Combined – 7.1 lb/hr	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
001	Combined CT/Duct Burner Exhaust	Opacity	10%	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT

Provisos for 100 MW Natural Gas Fired Combustion Turbine w/ Natural Gas/Hydrogen Fired 260 MMBtu/hr Duct Burner and Heat Recovery Steam Generator

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Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16, "Major Source Operating Permits."	Rule 335-3-16
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]."	Rule 335-3-14-.04
3. The combustion turbine associated with this unit is subject to the provisions of ADEM Admin. Code r. 335-3-10-.02(33), 40 CFR 60 Subpart GG "Standards of Performance for Stationary Gas Turbines."	Rule 335-3-10-.02(33) 40 CFR Part 60 Subpart GG
4. The duct burner associated with this unit is subject to the provisions of ADEM Admin. Code r. 335-3-10-.02(33), 40 CFR 60 Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units."	Rule 335-3-10-.02(2)(b) 40 CFR Part 60 Subpart Db
5. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated as enforceable conditions of this permit.	Rule 335-3-16-.05(a)2
6. This unit is subject to the applicable provisions of the Clean Air Interstate Rule found in ADEM Admin. Code r. 335-3-5-.06 through 335-3-5-.14 and 335-3-8-.16 through 335-3-8-.33.	Rules 335-3-5-.06 through 335-3-5-.14 and Rules 335-3-8-.16 through 335-3-8-.33
Emission Standards	
1. Emissions exceeding any allowances that the source lawfully holds under Title IV of the Act or the regulations promulgated thereunder are prohibited.	Rule 335-3-16-.05(d)
2. Nitrogen Oxides emissions from the combustion turbine shall not exceed 15 ppmvd @ 15% O_2 and 62.5 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
3. Nitrogen Oxides emissions from the duct burner shall not exceed 0.20 lb/MMBtu and 34.0 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
4. Nitrogen Oxides emissions from the combined combustion turbine/duct burner stack shall not exceed 0.09 lb/MMBtu and 96.5 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
5. Carbon Monoxide emissions from the combustion turbine shall not exceed 0.07 lb/MMBtu and 61.5 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT

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6. Carbon Monoxide emissions from the duct burner shall not exceed 0.07 lb/MMBtu and 18.2 lbs/hr when operating above a heat input of 130 MMBtu/hr and 0.1 lb/MMBtu when operating at or below a heat input of 130 MMBtu/hr.	Rule 335-3-14-.04(9)(b) BACT
7. Carbon Monoxide emissions from the combined combustion turbine/duct burner stack shall not exceed 0.08 lb/MMBtu and 79.7 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
8. Volatile Organic Compound emissions from the combustion turbine shall not exceed 3.7 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
9. Volatile Organic Compound emissions from the duct burner shall not exceed 3.4 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
10. Volatile Organic Compound emissions from the combined combustion turbine/duct burner stack shall not exceed 7.1 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
11. Particulate emissions from the combustion turbine shall not exceed 0.01 lb/MMBtu and 5.0 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
12. Particulate emissions from the duct burner shall not exceed 0.02 lb/MMBtu and 2.9 lbs/hr.	Rule 335-3-14-.04(9)(b) BACT
13. Particulate emissions from the combined turbine/duct burner stack shall not exceed 0.01 lb/MMBtu and 7.9 lb/hr.	Rule 335-3-14-.04(9)(b) BACT
14. Visible emissions from the combined turbine/duct burner stack shall not exceed 10% opacity.	Rule 335-3-14-.04(9)(b) BACT
15. The emissions standards in Provisos 2 – 14 above apply at all times except during periods of startup, shutdown, and load change. Startup: The period from when the combustion turbine is started until it reaches 65 MW load. This period shall be readily identifiable on the load chart recording. Shutdown: The period when the load on the combustion turbine is decreasing from 65 MW load to when the fuel can be cut off from the unit. This period shall be readily identifiable on the load chart recording. Load Change: A rapid change in the electrical loading of a unit that is readily identifiable on the load chart recording.	Rule 335-3-14-.03(1)(h)
16. The combustion turbine shall fire only natural gas. The duct burner shall fire only natural gas or hydrogen.	Rule 335-3-14-.04
17. The owners and operators of each source subject to the Clean Air Interstate Rule (CAIR) shall comply with all applicable provisions of Rules 335-3-5-.06 through 335-3-5-.14 and Rules 335-3-8-.16 through 335-3-8-.33.	Rules 335-3-5-.06 through 335-3-5-.14 and Rules 335-3-8-.16 through 335-3-8-.33

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18. In the absence of CAIR, the owners and operators of each affected source shall comply immediately upon the compliance date of any such rule that replaces or supplements CAIR.	General Provisos 11(b) & 14
Compliance and Performance Test Methods and Procedures	
1. Compliance with the Nitrogen Oxides emissions standards shall be determined by EPA Reference Method 20 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
2. Compliance with the Carbon Monoxide emissions standards shall be determined by EPA Reference Method 10 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
3. Compliance with the Volatile Organic Compounds emissions standards shall be determined by EPA Reference Method 25, 25A, or 25B, as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
4. Compliance with the particulate emissions standards shall be determined by EPA Reference Method 5 or 17, as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
5. Compliance with the opacity standards shall be determined by EPA Reference Method 9 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
Emission Monitoring	
1. The NO_x emission rate from this unit shall be monitored by the NO_x Continuous Emissions Monitoring (CEMS). The NO_x emission rate shall be monitored on a rolling three-hour average. The NO_x CEMS shall be maintained and certified using the procedures of 40 CFR 75.	40 CFR 75 Rule 335-3-16-.05(c) 40 CFR 64 – CAM
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Operation of approved monitoring as detailed in §64.7. This monitoring shall begin upon the issuance of this permit and be conducted in accordance with the attached Appendix.	40 CFR Part 64 – CAM
3. If the Permittee is required by the Administrator to develop and implement a Quality Improvement Plan (QIP), it shall do so as specified in 40 CFR Part 64.8.	40 CFR Part 64 – CAM

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Recordkeeping and Reporting Requirements	
1. An emission report as defined by 40 CFR 60.7(c) will be submitted to the ADEM within 30 days of the end of the calendar quarter in the following format:	Rule 335-3-16-.05(c) Rule 335-3-1-.04
NO_x	
A. Source Operating Time (all times and periods in hours unless otherwise noted)	
B. Time Monitor System was Able to Record Source Performance*	
C. Monitor Availability (%) = B/A x 100	
D. Total Excess Emission Periods where the CEM data may indicate emissions above standards ** (3 hour periods)	
E. Overall Source Performance (%) = [(B - D)/B] x 100	
F. Exempt Periods - $F_{(x)}$ (3 hour periods)	
F_1 = Startup/Shutdown	
F_2 = Load Change	
G. Net Excess Emissions = D - $\sum F_{(x)}$ (3 hour periods)	
H. Net Source Performance (%):	
= [1 - (G/(B - $\sum F_{(x)}$))] x 100	
= [(B - $\sum F_{(x)}$ - G)/(B - $\sum F_{(x)}$)] x 100	
I. Overall Exceedances (%) - Percent of time above the standard due to all reasons:	
= 100-E	
J. Net Exceedances (%) - Percent of time above the standard due to non-exempt reasons:	
= 100-H	

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K. Exempt Period Exceedances (%) - Percent of time above the standard due to an exempted reason: SU/SD = $(F_1/B) \times 100$ Load Change = $(F_2/B) \times 100$ * Information identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments will be maintained and made available upon request. ** Report date, time, duration, magnitude, cause and corrective action taken for each occurrence. NO_x emissions rate (lb/MMBtu) will be computed as a 3-hour rolling average. NOTE: Data recorded during periods of system breakdowns, repairs, adjustments, and calibration checks shall not be included in any of the above data averages.	
Acid Rain Requirements 1. This unit is subject to the Acid Rain Rules contained in Rule 335-3-18 and 40 CFR Part 72, 73 and 75. The applicable Acid Rain Permit is contained in the Acid Rain portion of this Operating Permit.	Rule 335-3-18 and 40 CFR Parts 72, 73 and 75
CAIR Requirements 1. This unit is subject to the CAIR Rules contained in Rule 335-3-5 and Rule 335-3-8 and 40 CFR Parts 59 and 97. The applicable CAIR Permit is contained in the CAIR portion of this Operating Permit.	Rule 335-3-5, Rule 335-3-8, and 40 CFR Parts 59 and 97

Summary Page for 190 MMBtu/hr Natural Gas /Hydrogen Fired Boiler

Permitted Operating Schedule: 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
PB401	190 MMBtu/hr Boiler	NOx	0.05 lb/MMBtu – natural gas 9.5 lb/hr 0.07 lb/MMBtu – Hydrogen or 13.3 lb/hr H/NG	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
PB401	190 MMBtu/hr Boiler	CO	0.17 lb/MMBtu – natural gas/ 32.3 lb/hr hydrogen	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
PB401	190 MMBtu/hr Boiler	PM	0.01 lb/MMBtu – natural gas/ 1.9 lb/hr hydrogen	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
PB401	190 MMBtu/hr Boiler	VOC	1.0 lb/hr – natural gas 1.7 lb/hr – hydrogen or H/NG	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT
PB401	190 MMBtu/hr Boiler	Opacity	10%	ADEM Admin. Code r. 335-3-14-.04(9)(b) BACT

Provisos for 190 MMbtu/hr Natural Gas / Hydrogen Fired Boiler

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16, "Major Source Operating Permits."	Rule 335-3-16
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]."	Rule 335-3-14-.04
3. This boiler is subject to the applicable requirements of ADEM Admin. Code r. 335-3-10-.02(2)(b), 40 CFR 60 Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units."	Rule 335-3-10-.02(2)(b) 40 CFR Part 60 Subpart Db
Emission Standards	
1. Particulate matter emissions shall not exceed 0.01 lb/MMBtu and 1.9 lb/hr when burning natural gas or hydrogen or combinations thereof.	Rule 335-3-14-.04(9)(b) BACT
2. Nitrogen Oxide emissions shall not exceed 0.05 lb/MMBtu and 9.5 lb/hr when burning natural gas and 0.07 lb/MMBtu and 13.3 lb/hr when burning hydrogen or combinations thereof of natural gas and hydrogen.	Rule 335-3-14-.04(9)(b) BACT
3. Carbon Monoxide emissions shall not exceed 0.17 lb/MMBtu & 32.3 lb/hr when burning natural gas, hydrogen, or combinations thereof.	Rule 335-3-14-.04(9)(b) BACT
4. Volatile Organic Compound emissions shall not exceed 1.0 lb/hr when burning natural gas, 1.7 lb/hr when burning hydrogen or a combination of natural gas and hydrogen.	Rule 335-3-14-.04(9)(b) BACT
5. Visible emissions shall not exceed 10% opacity.	Rule 335-3-14-.04(9)(b) BACT
6. The emissions limits in Items 1 through 5 above apply except during periods of startup, shutdown, and load change.	Rule 335-3-14-.03(1)(h)
Compliance and Performance Test Methods and Procedures	
1. Compliance with the Nitrogen Oxides emissions standards shall be determined by EPA Reference Method 7 or 7E as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
2. Compliance with the Carbon Monoxide emissions standards shall be determined by EPA Reference Method 10 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05

Federally Enforceable Provisos	Regulations
3. Compliance with the Volatile Organic Compounds emissions standards shall be determined by EPA Reference Method 25, 25A, or 25B, as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
4. Compliance with the particulate emissions standards shall be determined by EPA Reference Method 5 or 17, as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
5. Compliance with the opacity standards shall be determined by EPA Reference Method 9 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
Emission Monitoring	
1. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Operation of approved monitoring as detailed in §64.7. This monitoring shall begin upon the issuance of this permit and shall be conducted in accordance with the attached Appendix.	40 CFR Part 64
2. If the Permittee is required by the Administrator to develop and implement a Quality Improvement Plan (QIP), it shall do so as specified in 40 CFR Part 64.8.	
3. The NO_x emission rate from this unit shall be monitored by the NO_x Continuous Emissions Monitoring System (CEMS). The NO_x emission rate shall be monitored on a 30-day rolling average. The NO_x CEMS shall be maintained and certified using the procedures of 40 CFR 60 Subpart Db.	40 CFR Part 60 Subpart Db Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. Within 30 days after the end of each calendar quarter, the permittee will submit excess NO_x emissions reports (EERs) to the Department. These reports shall contain all the applicable information required by 40 CFR 60.49b(g). One report shall include gas-fired hours of operation and a second report shall include hydrogen or hydrogen/gas-fired hours of operation.	40 CFR 60.49b(h)
2. A report of hours of operation will be submitted to ADEM within 30 days of the end of the quarter and will include the following information:	Rule 335-3-16-.05(c)

Federally Enforceable Provisos	Regulations
A. Number of gas-fired hours per quarter B. Number of gas-fired hours per quarter not coded as startup, shutdown or load change C. Number of gas-fired hours per quarter that CEMS was able to record valid data* D. Number of hydrogen-fired or hydrogen/gas-fired hours per quarter E. Number of hydrogen-fired or hydrogen/gas-fired hours per quarter not coded as startup, shutdown or load change F. Number of hydrogen-fired or hydrogen/gas-fired hours per quarter that CEMS was able to record valid data* * Information identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments will be maintained and made available upon request.	
3. This source is subject to the applicable requirements of 40 CFR part 64,"Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in 64.9.	40 CFR 64.9

Summary Page for Two (2) 184 MMBtu/hr Natural Gas /Hydrogen Fired Boilers

Permitted Operating Schedule: 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
PB201R, PB301R	184 MMBtu/hr Boiler	PM	3.0 lb/hr	ADEM Admin. Code r. 335-3-14-.04 Anti-PSD
PB201R, PB301R	184 MMBtu/hr Boiler	NOx	0.20 lb/MMBtu 9.0 lb/hr	Rule 335-3-10-.02(2)(b) 40 CFR 60 Subpart Db ADEM Admin. Code r. 335-3-14-.04 Anti-PSD
PB201R, PB301R	184 MMBtu/hr Boiler	SO_2	Natural Gas and Hydrogen Fuels Only	ADEM Admin. Code r. 335-3-14-.04 Anti-PSD
PB201R, PB301R	184 MMBtu/hr Boiler	CO	N/A	N/A
PB201R, PB301R	184 MMBtu/hr Boiler	VOC	N/A	N/A
PB201R, PB301R	184 MMBtu/hr Boiler	HAPs	N/A	N/A
PB201R, PB301R	184 MMBtu/hr Boiler	Opacity	20%, except one per hour ≤ 40%	ADEM Admin. Code r. 335-3-4-.01(1)

Provisos for Two (2) 184 MMBtu/hr Natural Gas Fired Boilers w/ Hydrogen Backup

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16, "Major Source Operating Permits."	Rule 335-3-16
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]."	Rule 335-3-14-.04
3. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-10-.02(1), 40 CFR Part 60, Subpart A "General Provisions."	Rule 335-3-10-.02(1) 40 CFR Part 60 Subpart A
4. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-10-.02(2)(b), 40 CFR Part 60, Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units."	Rule 335-3-10-.02(2)(b) 40 CFR Part 60 Subpart Db
Emission Standards	
1. These boilers shall fire only natural gas and/or hydrogen.	Rule 335-3-14-.04 Anti-PSD
2. The Nitrogen Oxides emission rate from each of these units shall not exceed 0.20 lb/MMBtu based on a 30-day rolling average.	Rule 335-3-10-.02(2)(b) 40 CFR 60.Subpart Db
3. The Nitrogen Oxides emission rate from each of these units shall not exceed 9.0 lb/hr, (0.0489 lbs/mmBtu at 184 mmBtu/hr of heat input).	Rule 335-3-14-.04 Anti-PSD
4. The particulate matter emission rate from each of these units shall not exceed 3.0 lb/hr, except during periods of startup, shutdown, or load change.	Rule 335-3-14-.04 Anti-PSD
5. The emissions standards in Provisos 3 - 4 above apply at all times except during periods of startup, shutdown, and load change.	Rule 335-3-14-.03(1)(h)1
6. These units shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall these units discharge a 6-minute average opacity of particulate emissions greater than 40%.	Rule 335-3-4-.01

Federally Enforceable Provisos	Regulations
Compliance and Performance Test Methods and Procedures	
1. Compliance with Nitrogen Oxides Emission Standard Number 2 shall be determined by the Continuous Emissions Monitoring System as specified in NSPS Subpart Db. Alternate methods may be utilized if approved in advance by the Department.	40 CFR 60.44b(c)
2. Compliance with Nitrogen Oxides Emission Standard Number 3 shall be determined by EPA Reference Method 7 or 7E as found in Appendix A of 40 CFR 60. Compliance with this standard may be indicated by the Continuous Emissions Monitoring System.	Rule 335-3-1-.05
3. Compliance with the particulate emissions standards shall be determined by EPA Reference Method 5 or 17, as found in Appendix A of 40 CFR 60. Alternate methods may be utilized if approved in advance by the Department.	Rule 335-3-1-.05
4. Compliance with the opacity standards shall be determined by EPA Reference Method 9 as found in Appendix A of 40 CFR 60.	Rule 335-3-1-.05
Emission Monitoring	
1. Compliance Assurance Monitoring shall be conducted in accordance with the attached Appendix.	40 CFR Part 64
2. The NO_x emission rate from these units shall be monitored by the NO_x Continuous Emissions Monitoring Systems (CEMS). The NO_x emission rates shall be monitored on a 30-day rolling average. The NO_x CEMS shall be maintained and certified using the procedures of 40 CFR 60.	Rule 335-3-10-.02(2)(b) 40 CFR Part 60.48b Rule 335-3-14-.04
Recordkeeping and Reporting Requirements	
1. Records documenting the amount and type of fuel burned in the boiler each day it is operated shall be kept in a form suitable for inspection for a period of at least five years following said recording.	40 CFR 60.49b(d)
2. Within 30 days after the end of each calendar quarter, the permittee will submit an excess NO_x emissions report (EER) to the Department. This report shall contain all the applicable information required by 40 CFR 60.49b.	40 CFR 60.49b

Federally Enforceable Provisos	Regulations
3. A report of hours of operation will be submitted to ADEM within 30 days of the end of the quarter and will include the following information: A. Number of gas-fired hours per quarter B. Number of gas-fired hours per quarter not coded as startup, shutdown or load change C. Number of gas-fired hours per quarter that CEMS was able to record valid data* * Information identifying each period during which the monitoring systems were inoperative (except for zero and span checks) and the nature of the system repairs or adjustments will be maintained and made available upon request.This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements.	Rule 335-3-16-.05(c) 40 CFR 64.9

Compliance Assurance Monitoring (CAM) Plans

CAM Plan- Steam Boiler 201R
Flue Gas Recirculation (FGR) for NOx Emission Control

I. Indicator	NO_x emission rate in lbs/mmBtu is the indicator of FGR performance.
Measurement Approach	
II. Indicator Range	A NOx emission rate of 0.049 lbs/mmBtu while burning Natural Gas (NG) monitored using a 30-day rolling average computed by CEMS is the designated indicator condition that provides reasonable assurance of ongoing compliance.
III. Performance Criteria	
Representative Data	The exhaust gas is continuously sampled by a probe located in the stack in accordance with 40 CFR 60, Appendix A. The NO_x concentration of the exhaust gas sample is measured by the NO_x CEMS analyzer in ppmv. The NO_x concentration is converted to lb/mmBtu and recorded by the CEMS DAHS.
Verification of Operational Status	The initial testing and certification procedures and the performance protocol (PS3) in 40 CFR 60, Appendix B were used to verify the CEMS operation status.
QA/QC Practices and Criteria	The practices that ensure continuing validity of the data are outlined in the monitoring requirements of 40 CFR 60.13.
Monitoring Frequency	Emissions are monitored continuously.
Data Collection Procedures/Averaging Period	Data is collected continuously and a 30-day rolling average is computed by the CEMS DAHS to determine whether an exceedance has occurred.

CAM Plan- Steam Boiler 301R
Flue Gas Recirculation (FGR) for NOx Emission Control

I. Indicator	NO_x emission rate in lbs/mmBtu is the indicator of FGR performance.
Measurement Approach	
II. Indicator Range	A NOx emission rate of 0.049 lbs/mmBtu while burning Natural Gas (NG) monitored using a 30-day rolling average computed by CEMS is the designated indicator condition that provides reasonable assurance of ongoing compliance.
III. Performance Criteria	
Representative Data	The exhaust gas is continuously sampled by a probe located in the stack in accordance with 40 CFR 60, Appendix A. The NO_x concentration of the exhaust gas sample is measured by the NO_x CEMS analyzer in ppmv. The NO_x concentration is converted to lb/mmBtu and recorded by the CEMS DAHS.
Verification of Operational Status	The initial testing and certification procedures and the performance protocol (PS3) in 40 CFR 60, Appendix B were used to verify the CEMS operation status.
QA/QC Practices and Criteria	The practices that ensure continuing validity of the data are outlined in the monitoring requirements of 40 CFR 60.13.
Monitoring Frequency	Emissions are monitored continuously.
Data Collection Procedures/Averaging Period	Data is collected continuously and a 30-day rolling average is computed by the CEMS DAHS to determine whether an exceedance has occurred.

CAM Plan- Steam Boiler 401
Flue Gas Recirculation (FGR) for NOx Emission Control

I. Indicator	NO_x emission rate in lbs/mmBtu is the indicator of FGR performance.
Measurement Approach	
II. Indicator Range	A NOx emission rate of 0.05 lb/mmBtu while burning Natural Gas (NG) or 0.07 lb/mmBtu while burning Hydrogen (H) or H/NG monitored using a 30-day rolling average computed by CEMS is the designated indicator condition that provides reasonable assurance of ongoing compliance.
III. Performance Criteria	
Representative Data	The exhaust gas is continuously sampled by a probe located in the stack in accordance with 40 CFR 60, Appendix A. The NO_x concentration of the exhaust gas sample is measured by the NO_x CEMS analyzer in ppmv. The NO_x concentration is converted to lb/mmBtu and recorded by the CEMS DAHS.
Verification of Operational Status	The initial testing and certification procedures and the performance protocol (PS3) in 40 CFR 60, Appendix B were used to verify the CEMS operation status.
QA/QC Practices and Criteria	The practices that ensure continuing validity of the data are outlined in the monitoring requirements of 40 CFR 60.13.
Monitoring Frequency	Emissions are monitored continuously.
Data Collection Procedures/Averaging Period	Data is collected continuously and a 30-day rolling average is computed by the CEMS DAHS to determine whether an exceedance has occurred.

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: • New • Revised •X For Acid Rain permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Facility (Source) Name	State	Plant Code
Washington County Cogeneration	AL	7697

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
CC1	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Washington County Cogeneration
Facility (Source) Name (from STEP 1)

STEP 3

Read the standard requirements.

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:
(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
(2) The owners and operators of each affected source and each affected unit at the source shall:
(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:
(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Washington County Cogeneration
Facility (Source) Name (from STEP 1)

STEP 3

Read the standard requirements.

Permit Requirements

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Washington County Cogeneration
Facility (Source) Name (from STEP 1)

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Washington County Cogeneration
Facility (Source) Name (from STEP 1)

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a source can hold; *provided,* that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Anthony J. Marino	
Signature Anthony J Marino	Date 7/24/2008

Phase II Acid Rain Permit

Issued by: Alabama Department of Environmental Management
Issued to: Alabama Power Company – Washington County Cogeneration Plant
Operated by: Alabama Power Company
ORIS Code: 7697
Effective: DRAFT through DRAFT

Acid Rain Permit Contents

1) Statement of Basis

2) SO_2 allowances allocated under this permit and NO_x requirements for each affected unit.

3) Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process and any additional requirements or conditions.

4) The Phase II Permit Application submitted for this source, as corrected by the Alabama Department of Environmental Management. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the Phase II Permit Application.

5) Summary of Previous Actions and Current Action.

1) Statement of Basis:

Statutory and Regulatory Authorities: In accordance with the Code of Alabama 1975, §§ 22-22A-4, 22-22A-6, 22-22A-8, 22-28-14, and Titles IV and V of the Clean Air Act, the Alabama Department of Environmental Management issues this permit pursuant to ADEM Admin. Codes 335-3-16 and 335-3-18.

2) SO_2 Allowance Allocations and NO_x Requirements for each affected unit:

		2010	2011	2012	2013	2014
CC1	SO_2 allowances, under 40 CFR part 73 [tons]	NA[1]	NA[1]	NA[1]	NA[1]	NA[1]
	NO_x limit [lb/MMBtu]	¤2	¤2	¤2	¤2	¤2

1 The number of allowances allocated to Phase II affected units by U.S. EPA may change under 40 CFR Part 73. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. Neither of the aforementioned conditions necessitate a revision to SO_2 allowance allocations identified in this permit [See 40 CFR 72.84].

2 40 CFR Part 76 does not establish a NOx emission rate for Combined Cycle Unit CC1.

3) Comments, Notes, and Justifications: This facility consists of a combined cycle 100 MW Natural Gas Fired Combustion Turbine with a Natural Gas/Hydrogen Fired 260 MMBtu/hr Duct Burner and Heat Recovery boiler, a 190 MMBtu/hr Natural Gas Fired Boiler, and 2 – 184 MMBtu/hr Natural Gas Fired Boilers. The Heat Recovery Boiler supplies steam to an adjacent industrial facility and a 37 MW steam turbine. The two natural gas fired boilers also supply steam to the adjacent industrial facility. The two natural gas fired boilers are not used for electric generation and are not affected units under Acid Rain.

4) Phase II Permit Application: Attached.

5) Summary of Previous Actions and Current Action:

	Action	Date
1.	Draft permit prepared and submitted for public review and comment.	November 25, 1998
2.	Permit finalized and issued.	January 28, 1999
3.	Permit Re-Issued for Name Change	November 22, 1999
4.	Permit Re-Issued to include actual commence operation and monitor certification deadline dates.	March 30, 2000
5.	Draft permit prepared and submitted for public review and comment.	December 1, 2004
6.	Permit finalized and re-issued.	January 1, 2005
7.	Draft permit prepared and submitted for public review and comment.	Draft
8.	Permit finalized and re-issued.	Draft

_____ _____

Ronald W. Gore, Chief
Air Division

Date

CAIR Permit Application
(for sources covered under a CAIR SIP)

For more information, please refer to ADEM Admin. Code chapters 335-3-5 and 335-3-8

This submission is: [X] New ☐ Revised

STEP 1
Identify the source by plant name, State, and ORIS or facility code

Washington County Cogeneration	AL	7697
Plant Name	State	ORIS/Facility Code

STEP 2
Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO_X Annual	SO_2	NO_X Ozone Season
CC1	X	X	X

STEP 3
Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date

Standard Requirements

(a) Permit Requirements.

(1) The CAIR designated representative of each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) required to have a title V operating permit or synthetic minor operating permit and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) required to have a title V operating permit or synthetic minor operating permit at the source shall:

(i) Submit to the Department a complete CAIR permit application under rules 335-3-5-.08, 335-3-8-18(3), and 335-3-8-.27(3) (as applicable); and

(ii) Submit in a timely manner any supplemental information that the Department determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.

(2) The owners and operators of each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) required to have a title V operating permit or synthetic minor operating permit and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) required to have a title V operating permit or synthetic minor operating permit at the source shall have a CAIR permit issued by the Department under rules 335-3-5-.08, 335-3-8-.18, and 335-3-8-.27 (as applicable) for the source and operate the source and the unit in compliance with such CAIR permit.

Washington County Cogeneration
Plant Name (from Step 1)

STEP 3, continued

(b) Monitoring, reporting, and recordkeeping requirements.

(1) The owners and operators, and the CAIR designated representative, of each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall comply with the monitoring, reporting, and recordkeeping requirements of rules 335-3-5-.13, 335-3-8-.23, and 335-3-8-.32 (as applicable).

(2) The emissions measurements recorded and reported in accordance with rules 335-3-5-.13, 335-3-8-.23, and 335-3-8-.32 (as applicable) shall be used to determine compliance by each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) with the CAIR NO_X emissions limitation, CAIR SO_2 emissions limitation, and CAIR NO_X Ozone Season emissions limitation (as applicable) under subparagraph (c) of rules 335-3-5-.06(6), 335-3-8-.16(6), 335-3-8-.25(6) (as applicable).

(c) Nitrogen oxides emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X source and each CAIR NO_X unit at the source shall hold, in the source's compliance account, CAIR NO_X allowances available for compliance deductions for the control period under rule 335-3-8-.21(5)(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_X units at the source, as determined in accordance with rule 335-3-8-.23.

(2) A CAIR NO_X unit shall be subject to the requirements under subparagraph (c)1. of rule 335-3-8-.16(6) for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under rule 335-3-8-.23(1)(b)1., 2., or 5. and for each control period thereafter.

(3) A CAIR NO_X allowance shall not be deducted, for compliance with the requirements under subparagraph (c)1. of 335-3-8-.16(6), for a control period in a calendar year before the year for which the CAIR NO_X allowance was allocated.

(4) CAIR NO_X allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Allowance Tracking System accounts in accordance with rules 335-3-8-.21, 335-3-8-.22, and 335-3-8-.24.

(5) A CAIR NO_X allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_X Annual Trading Program. No provision of the CAIR NO_X Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under rule 335-3-8-.16(5) and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_X allowance does not constitute a property right.

(7) Upon recordation by the Administrator under rule 335-3-8-.20, 335-3-8-.21, 335-3-8-.22, or 335-3-8-.24, every allocation, transfer, or deduction of a CAIR NO_X allowance to or from a CAIR NO_X source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR NO_X unit.

Sulfur dioxide emission requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR SO_2 source and each CAIR SO_2 unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO_2 allowances available for compliance deductions for the control period under rule 335-3-5-.11(5)(a) and (b) not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO_2 units at the source, as determined in accordance with rule 335-3-5-13.

(2) A CAIR SO_2 unit shall be subject to the requirements under subparagraph (c)1. of rule 335-3-5-.06(6) for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under rule 335-3-5-.13(1)(b)1., 2., or 5. and for each control period thereafter.

(3) A CAIR SO_2 allowance shall not be deducted, for compliance with the requirements under subparagraph (c)1. of rule 335-3-5-.06(6), for a control period in a calendar year before the year for which the CAIR SO_2 allowance was allocated.

(4) CAIR SO_2 allowances shall be held in, deducted from, or transferred into or among CAIR SO_2 Allowance Tracking System accounts in accordance with rules 335-3-5-.11, 335-3-5-.12, and 335-3-5-.14.

(5) A CAIR SO_2 allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO_2 Trading Program. No provision of the CAIR SO_2 Trading Program, the CAIR permit application, the CAIR permit, or an exemption under rule 335-3-5-.06(5) and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR SO_2 allowance does not constitute a property right.

(7) Upon recordation by the Administrator under rules 335-3-5-.11, 335-3-5-.12, and 335-3-5-.14, every allocation, transfer, or deduction of a CAIR SO_2 allowance to or from a CAIR SO_2 source's compliance account is incorporated automatically in any CAIR permit of the source that includes the CAIR SO_2 unit.

Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for a control period, the owners and operators of each CAIR NO_X Ozone Season source and each CAIR NO_X Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_X Ozone Season allowances available for compliance deductions for the control period under rule 335-3-8-.30(5)(a) in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_X Ozone Season units at the source, as determined in accordance with rule 335-3-8-.32.

(2) A CAIR NO_X Ozone Season unit shall be subject to the requirements under subparagraph (c)1. of rule 335-3-8-.25(6) for the control period starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under rule 335-3-8-.32(1)(b)1., 2., 3. or 7. and for each control period thereafter.

(3) A CAIR NO_X Ozone Season allowance shall not be deducted, for compliance with the requirements under subparagraph (c)1. of rule 335-3-8-.25(6), for a control period in a calendar year before the year for which the CAIR NO_X Ozone Season allowance was allocated.

(4) CAIR NO_X Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_X Ozone Season Allowance Tracking System accounts in accordance with rules 335-3-8-.30, 335-3-8-.31, and 335-3-8-.33.

(5) A CAIR NO_X allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_X Ozone Season Trading Program. No provision of the CAIR NO_X Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under rule 335-3-8-.25(5) and no provision of law shall be construed to limit the authority of the State or the United States to terminate or limit such authorization.

(6) A CAIR NO_X allowance does not constitute a property right.

(7) Upon recordation by the Administrator under rule 335-3-8-.29. 335-3-8-.30, 335-3-8-.31, or 335-3-8-.33, every allocation, transfer, or deduction of a CAIR NO_X Ozone Season allowance to or from a CAIR NO_X Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

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(d) Excess emissions requirements.
If a CAIR NO_X source emits nitrogen oxides during any control period in excess of the CAIR NO_X emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X unit at the source shall surrender the CAIR NO_X allowances required for deduction under 335-3-8-.21(5)(d)1. and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR SO_2 source emits sulfur dioxide during any control period in excess of the CAIR SO_2 emissions limitation, then:
(1) The owners and operators of the source and each CAIR SO_2 unit at the source shall surrender the CAIR SO_2 allowances required for deduction under rule 335-3-5-.11(5)(d)1. and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

If a CAIR NO_X Ozone Season source emits nitrogen oxides during any control period in excess of the CAIR NO_X Ozone Season emissions limitation, then:
(1) The owners and operators of the source and each CAIR NO_X Ozone Season unit at the source shall surrender the CAIR NO_X Ozone Season allowances required for deduction under rule 335-3-8-.30(5)(d)1. and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or applicable State law; and
(2) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of this subpart, the Clean Air Act, and applicable State law.

(e) Recordkeeping and Reporting Requirements.
(1) Unless otherwise provided, the owners and operators of the CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the permitting authority or the Administrator.
(i) The certificate of representation under rules 335-3-5-.07(4), 335-3-8-.17(4) and 335-3-8-.26(4) (as applicable) for the CAIR designated representative for the source and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under rules 335-3-5-.07(4), 335-3-8-.17(4) and 335-3-8-.26(4) (as applicable) changing the CAIR designated representative.
(ii) All emissions monitoring information, in accordance with rules 335-3-5-.13, 335-3-8-.23, and 335-3-8-.32 (as applicable), provided that to the extent that rules 335-3-5-.13, 335-3-8-.23, and 335-3-8-.32 (as applicable) provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(2) The CAIR designated representative of a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) at the source shall submit the reports required under the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) including those under rules 335-3-5-.13, 335-3-8-.23, and 335-3-8-.32 (as applicable).

(f) Liability.
(1) Each CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) and each NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) shall meet the requirements of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable).
(2) Any provision of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) that applies to a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) or the CAIR designated representative of a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO_X units, CAIR SO_2 units, and CAIR NO_X Ozone Season units (as applicable) at the source.
(3) Any provision of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable) that applies to a CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) shall also apply to the owners and operators of such unit.

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STEP 3, continued

(g) Effect on Other Authorities.
No provision of the CAIR NO_X Annual Trading Program, CAIR SO_2 Trading Program, and CAIR NO_X Ozone Season Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under rules 335-3-5-.06(5), 335-3-8-.16(5), and 335-3-8-.25(5) (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_X source, CAIR SO_2 source, and CAIR NO_X Ozone Season source (as applicable) or CAIR NO_X unit, CAIR SO_2 unit, and CAIR NO_X Ozone Season unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Certification

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name **Willard L. Bowers**	
Signature	Date 6/26/07

CAIR NO_x Annual Trading Program Permit

Issued by: Alabama Department of Environmental Management
Issued to: Alabama Power Company – Washington County Cogeneration Plant
Operated by: Alabama Power Company
ORIS Code: 7697
Effective: DRAFT through DRAFT

1. This permit automatically incorporates the definition of terms under ADEM Admin. Code r. 335-3-8-.16(2).

2. This permit records automatically, upon recordation by the EPA Administrator in accordance with ADEM Admin. Code r. 335-3-8-.21, 335-3-8-.22, and 335-3-8-.24 every allocation, transfer, or deduction of a CAIR NO_X allowance to or from the compliance accounts of the CAIR NO_X Units covered by the permit or the overdraft account of the CAIR NO_X Source covered by the permit.

3. This permit incorporates the attached CAIR NO_x Permit application. The owners or operators of the source must comply with the standard requirements and special provisions set forth in the application.

4. This permit incorporates the following comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process: NONE

5. Summary of Previous Actions and Current Action:

Action	Date
Draft permit prepared and submitted for public review and comment.	XXXX
Permit finalized and issued.	XXXX

_____ _____

Ronald W. Gore, Chief
Air Division

Date

CAIR NO_x Ozone Season Trading Program Permit

Issued by: Alabama Department of Environmental Management
Issued to: Alabama Power Company – Washington County Cogeneration Plant
Operated by: Alabama Power Company
ORIS Code: 7697
Effective: DRAFT through DRAFT

1. This permit automatically incorporates the definition of terms under ADEM Admin. Code r. 335-3-8-.25(2).

2. This permit records automatically, upon recordation by the EPA Administrator in accordance with ADEM Admin. Code r. 335-3-8-.30, 335-3-8-.31, and 335-3-8-.33 every allocation, transfer, or deduction of a CAIR NO_X Ozone Season allowance to or from the compliance accounts of the CAIR NO_X Ozone Season Units covered by the permit or the overdraft account of the CAIR NO_X Ozone Season Source covered by the permit.

3. This permit incorporates the attached CAIR NO_x Ozone Season Permit application. The owners or operators of the source must comply with the standard requirements and special provisions set forth in the application.

4. This permit incorporates the following comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process: NONE

5. Summary of Previous Actions and Current Action:

Action	Date
Draft permit prepared and submitted for public review and comment.	XXXX
Permit finalized and issued.	XXXX

_____ _____

Ronald W. Gore, Chief
Air Division

Date